

June 18, 2019

Honorable Judge LaShann DeArcy Hall  
United States District Judge

United States District Court for the Eastern District of New York  
225 Cadman Plaza East, Courtroom 4H North Brooklyn, NY 11201

\*FILED\*

2019 JUN 18 PM 10:40

**Re: *Rosenshine v. A. Meshi Cosmetics Industries Ltd. et al*, Case # 1:18-cv-03572-LDH-LB**

Dear Judge DeArcy Hall,

We are writing to request an extension of time for serving our opposition to Defendant A. Meshi's motion to dismiss, so that our due date would be set to July 31, 2019.

In accordance with the Court's Individual Practices I(E)2, we confirm:

- a) our opposition would have been due June 20, 2019;
- b) we seek this extension of time as we need considerably more time to gather, read, and analyze the cases cited by Defendant A. Meshi (about 80 cases in total) and adequately prepare our opposition;
- c) this is the first extension of time we have sought for serving our opposition;
- d) Defendant A. Meshi does not consent to this request for an extension of time, stating that it does not consider the foregoing reason to be a justifiable basis for any extension; and
- e) the extension of time affects Defendant A. Meshi's scheduled date for serving its reply and filing the fully briefed motion to dismiss, which would have to be rescheduled accordingly from July 11, 2019 to August 21, 2019.

We note that since our amended complaint was filed on March 6, 2019, Defendant A. Meshi effectively had three months to draft its 25-page motion to dismiss, as it served it on June 6, 2019. We therefore feel that the time extension we are seeking is reasonable in these circumstances.

On this basis, we respectfully request that the Court grant us an extension of time to serve our opposition to Defendant A. Meshi's motion to dismiss, and order that we serve any opposition on or before July 31, 2019 and Defendant A. Meshi serve any reply and file the fully briefed motion to dismiss on or before August 21, 2019.

Respectfully submitted,

Oren Rosenshine  
Oren Rosenshine

Amir Rosenshine  
Amir Rosenshine

